

7 - 4 SUMMARY OF ECDC OVERSIGHT BY THE DIVISION OF SOLID AND HAZARDOUS WASTE

Oversight Staff

East Carbon Development Corporation (ECDC) is a commercial non-hazardous solid waste facility located in Carbon County. The solid waste section of the Division of Solid and Hazardous Waste consists of one environmental engineer and four environmental scientists along with a section manager. One staff member, an environmental engineer, is assigned to the ECDC facility with other staff members providing assistance when special expertise is required. The environmental engineer assigned to the ECDC facility conducts inspections of site operations, construction oversight, and permit review. Additionally, a district engineer of the Department of Environmental Quality resides in Price and can provide oversight support.

The Division of Solid and Hazardous Waste can coordinate the added support of the staff of the Southeastern Utah District Health Department as they are available.

Routine Facility Inspection Program

General inspections of the facility are conducted quarterly. These inspections focus on the operation of the facility, looking at compliance with cover, litter, monitoring equipment maintenance and other operational issues. One of the quarterly inspections is a detailed review of the entire facility operation and records. During the detailed inspection facility records are reviewed, waste inspections procedures are reviewed, personal training is reviewed, and a detailed review of the sight operation is conducted. Quarterly inspections require approximately four hours and generally involve one staff member. However, if specific areas such as ground water monitoring are to be reviewed, a staff member with special expertise in the area may be involved.

Special Investigation Activities

During the five year life of the facility permit, several periods of new construction may occur. As the conditions of the installed liner are very important for the overall environmental protection provided by the facility, inspections of the liner installation are very important. During the construction phase of a new or expanded landfill cell, inspections are conducted on a weekly basis. Special inspections may result from reports of permit non-compliance or for special issues related to waste acceptance or other monitoring issues. Follow up inspections are conducted when violations are found in order to assure that the necessary actions are taken.

Enforcement Activities

Inspections may result in notices of violation, compliance orders, and settlements. Notices of violation are prepared and sent to the facility and to other operations that may have a part in the action that caused the violation, such as waste generators and transporters. Each notice of violation is accompanied by an order to comply. Compliance actions may require review of the facility operation and possible permit modification. Each violation is resolved by a stipulation and consent order that is negotiated between the facility and the Division.

Other Facility Activities

Other facility activities include review of annual reports, review of ground water monitoring data, and statistical analysis. The ECDC facility has background and downgradient monitoring wells. Monitoring data for each well must be reviewed to assure that the proper analyses were conducted and that the results were properly documented. Each well must be analyzed to assure that the ground water monitored in the well has not been impacted by landfill operation.

Statistical analysis is the method that is used to make this assurance. The statistical analysis is conducted by the facility and must be reviewed by division staff for accuracy and compliance with the rules. Along with the required reports and other document reviews required of ECDC, questions arise as to the suitability of specific waste streams for disposal at the facility. These questions require research and questioning of the waste generator, a waste analysis review, and applicable rule review.

Permitting Program

Solid waste facility permits are issued for a duration of five years. During the five-year review/renewal phase all aspects of the permit are reviewed. Special consideration is given to the recalculation of the required financial assurance amount and the current status of the closure plan for the facility. Particular attention is also given to the ground water monitoring and statistical analysis of the data.

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